



RCRA PERMIT  
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WAD 00081 2917

9-30-92

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue  
Seattle, Washington 98101

Reply To  
Attn. Of: HW-106

SEP 30 1992

FILE COPY

John Stiller  
Project Coordinator  
Burlington Environmental Inc.  
2203 Airport Way South, Suite 400  
Seattle, WA. 98134

Re: RFI Workplan  
U.S. EPA ID# WAD 00081 2917

Dear Mr. Stiller:

This letter is in response to Burlington Environmental Inc.'s (BE) letter of July 30, 1992. In that letter, BE proposes responses to two provisions of the Environmental Protection Agency's (EPA) July 9, 1992 conditional RFI workplan approval: one pertaining to DNAPL monitoring and the other to hydrological zone interconnection. Below are EPA's responses to BE's proposals.

1) **DNAPL Monitoring:** EPA approves the re-location of monitoring wells CP-115A and CP-115B for monitoring of the lowest area of the silty-sand confining layer in the shallow aquifer as described in BE's July 30, 1992 letter.

2) **Hydrological Zone interconnection:** EPA agrees with the monitoring construct BE has proposed for evaluating hydrological zone interconnection, but is concerned about the proposed movement of monitoring well 107B to the approximate location of well CP-106. Moving well 107B results in a large unmonitored area of the lower aquifer along the West edge of the facility. EPA would prefer to maintain a well at this location creating a well system in the lower aquifer in which every major direction around the facility would be monitored. However, as we have discussed in telephone conversation, since the net groundwater flow direction has not yet been determined for the lower aquifer, EPA is willing to consider the installation of well 107B contingent upon this determination. Because BE will be providing their proposal for determining the net direction of groundwater flow in the lower aquifer in their 90-day response (due October, 9, 1992), EPA's final decision in this matter will await that proposal. EPA's decision will be based upon on the completeness of BE's proposal, including collecting the necessary information

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and producing the necessary evaluation products to determine the net direction of groundwater flow in the lower aquifer and the need for monitoring well CP-107B.

If you have any questions, please call me at (206) 553-8582.

Sincerely,

A handwritten signature in cursive script that reads "David Croxton".

David Croxton  
Environmental Scientist

cc: D. Hotchkiss, Port of Seattle  
G. Tritt, Ecology  
D. Brown, Ecology

DRAFT

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Sincerely,

David Croxton  
Environmental Scientist

cc: D. Hotchkiss, Port of Seattle  
G. Tritt, Ecology  
D. Brown, Ecology

bcc: C. Sikorski